

EXHIBIT E

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ELENA DINVERNO, *an individual*,

Plaintiff,

vs.

Case No. 21-cv-11001
Hon. Mark A. Goldsmith
Mag. Kimberly G. Altman

ROCHESTER COMMUNITY SCHOOLS DISTRICT, *a government entity*, **KRISTIN BULL**, *in her individual and official capacity*, **DR. ROBERT SHANER**, *in his individual and official capacity*,

Defendants.

DEBORAH GORDON LAW

Deborah L. Gordon (P27058)
Elizabeth Marzotto Taylor (P82061)
Sarah Gordon Thomas (P83935)
Molly Savage (P84472)
Attorneys for Plaintiff
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PLUNKETT COONEY

Courtney L. Nichols (P75160)
Attorney for Defendants
38505 Woodward Avenue, Suite 100
Bloomfield Hills, Michigan 48304
(248) 594-6460
cnichols@plunkettcooney.com

NOTICE OF TAKING DEPOSITIONS

Plaintiff **Elena Dinverno**, by her attorneys **Deborah Gordon Law**, will take the depositions of the individuals named below on the dates and times at Deborah Gordon Law, 33 Bloomfield Hills Parkway, Suite 220, Bloomfield Hills, Michigan 48304, said depositions to continue from day to day until complete.

These depositions will be taken for purposes of discovery, pursuant to Rule 30, or as evidence, or both, before an officer authorized by law to administer oaths.

Demand is hereby made that you present said deponents on the dates and times below remotely. All counsel is invited to attend and cross-examine said witnesses.

Thursday, August 26, 2021

Dr. Robert Shaner. 10:00 a.m.

Wednesday, September 1, 2021

Kristin Bull 10:00 a.m.

Dated: June 15, 2021

DEBORAH GORDON LAW

/s/ Molly Savage

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CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2021, the Notice of Taking Depositions was served upon defense counsel via EMAIL only.

/s/ Lynne Sheridan

Lynne Sheridan

UNITED STATES DISTRICT COURT
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Demand is hereby made that you present said deponents on the dates and times below remotely. All counsel is invited to attend and cross-examine said witnesses.

Tuesday, October 26, 2021

Dr. Robert Shaner. 10:00 a.m.

Thursday, November 4, 2021

Kristin Bull 10:00 a.m.

Dated: September 3, 2021

DEBORAH GORDON LAW

/s/ Molly Savage

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I hereby certify that on September 3, 2021, the Re-Notice of Taking Depositions was served upon defense counsel via EMAIL only.

/s/ Lynne Sheridan

Lynne Sheridan

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Demand is hereby made that you present said deponents on the dates and times below remotely. All counsel is invited to attend and cross-examine said witnesses.

Thursday, December 2, 2021

Dr. Robert Shaner. 10:00 a.m.

Thursday, December 16, 2021

Kristin Bull 10:00 a.m.

Dated: November 4, 2021

DEBORAH GORDON LAW

/s/ Molly Savage

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I hereby certify that on November 4, 2021, the Re-Notice of Taking Depositions was served upon defense counsel via EMAIL only.

/s/ Lynne Sheridan

Lynne Sheridan

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Demand is hereby made that you present said deponent on the date and time below remotely.

All counsel is invited to attend and cross-examine said witness.

Monday, January 10, 2022

Dr. Robert Shaner. 10:00 a.m.

DEBORAH GORDON LAW

Dated: December 15, 2021

/s/ Molly Savage

Deborah L. Gordon (P27058)
Elizabeth Marzotto Taylor (P82061)
Sarah Gordon Thomas (P83935)
Molly Savage (P84472)
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/s/ Lynne Sheridan

Lynne Sheridan

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Demand is hereby made that you present said deponent on the date and time below remotely.

All counsel is invited to attend and cross-examine said witness.

Thursday, February 3, 2022

Dr. Robert Shaner. 10:00 a.m.

Dated: January 11, 2022

DEBORAH GORDON LAW

/s/ Molly Savage

Deborah L. Gordon (P27058)
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I hereby certify that on January 11, 2022, the Re-Notice of Taking Deposition was served upon defense counsel via EMAIL only.

/s/ Lynne Sheridan

Lynne Sheridan